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### REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

### Status of Claims

Claims 1-26 are pending in the application. Claims 1-26 have been rejected. Claims 1, 3, 5-8, 13, 14, 16, 19, 22, 23 and 26 have been amended.

New claims 27 and 28 have been added in order to further define what the Applicants consider to be the invention. Applicants respectfully assert that no new matter has been added.

Applicants respectfully assert that the amendments to the claims add no new matter.

### CLAIM REJECTIONS

#### 35 U.S.C. § 102 Rejections

In the Office Action, the Examiner rejected claims 1-26 under 35 U.S.C. § 102(e), as being anticipated by Li et al. (US Patent No. 6,012,088). Applicants respectfully traverse this rejection in view of the remarks that follow.

Li et al. describes the initial process of establishing a connection of a user to the network, by using real IDs to authenticate a user and logging him/her on to the network. In contrast, Shaked et al. describes the tracing back of the connection establishment from any point on the network back to the persistent user IDs. Shaked et al. enables extracting real,

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permanent or persistent IDs (e.g., name, billing information, user ID) of users already connected to the network, by using the databases of the network service provider, for example an Internet Service Provider. Li et al. does not focus on real user identification, and hence does not discriminate between transient and persistent identities.

Shaked et al., in paragraph 3 describes "... Acquiring real-world information about a user is herein defined as "user identification". Such information includes, for example, first name, last name, full home address telephone numbers for home and work, fax and mobile, and credit card information." Such "user information" is generally consistent, permanent or persistent data which may identify a user online or offline. This data is hereinafter referred to as "persistent data". In contrast to this "persistent data", Shaked et al. repeatedly refers to the "network address" (see claim 1 and numerous other places), which is data that may not be trusted (see claim 17: "...said service provider determining the veracity of the network address reported by the user..."). It is a fundamental property of the network address that it is assigned to a user at the time of logging onto the network. As a result, this "network address" is identification data that may be considered to be transient, and generally changes from session to session, on a daily or even hourly basis. Network address data therefore cannot be trusted because it is so transient, since it may be easily forged or "spoofed", and because many of the normal network mechanisms (e.g., proxies and NATs) may mask the original network ID as a consequence of their normal function. Therefore, the network ID referred to in the original phrasing of the claim is hereinafter referred to as "transient data" or "transient ID".

Applicants have amended claims 1, 17 and 22 to better explain the different identity data types. The usage of both these data types enables establishment of a persistent and trusted identity. Applicants have further added new claims 27 and 28, to describe additional features of the previously claimed embodiments. Applicants note that Li et al. does not teach or suggest using real user identification, and hence does not discriminate between transient and persistent identities. Further, Li et al. teaches away from using real user identification as inherently, the Li et al. invention deals with the initial establishment of a connection of a user to a network, using real identity data to authenticate a user and logging him/her on to the network. This may be contrasted with the Shaked et al. invention, which assumes that a connection/identity establishment process has taken place (e.g., using a "normal" dial-up or

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other suitable connection procedures, as described by Li et al. or by any other means), and subsequently acquires and utilizes "persistent" identity data which is normally unavailable in the network. The new claims add no new matter.

Accordingly, Applicants respectfully assert that amended independent claims 1, 17 and 22 are allowable. Claims 2-16, 18-21 and 23-26 depend from, directly or indirectly, claims 1, 17 and 22, and therefore include all the limitations of those claims. Therefore, Applicants respectfully assert that claims 2-16, 18-21 and 23-26 are likewise allowable. Accordingly, Applicants respectfully request that the Examiner withdraw the rejections to amended independent claims 1, 17 and 22 and to claims 2-16, 18-21 and 23-26 dependent thereon.


Applicants respectfully request reconsideration and withdrawal of the rejections of claims 1-26.

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 50-3400.

Respectfully submitted,



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